



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

July 1, 2005

Jeffrey E. Bailey, Supervisor, Inyo National Forest
Edward C. Cole, Supervisor, Sierra National Forest
Attn: Trail and Commercial Pack Stock DEIS
c/o Inyo National Forest
351 Pacu Lane, Suite 200
Bishop, CA 03514

Subject: Draft Environmental Impact Statement (DEIS) for Trail and Commercial Pack Stock Management in the Ansel Adams and John Muir Wildernesses, Inyo and Sierra National Forests, California (CEQ# 20050151)

Dear Mr. Bailey and Mr. Cole:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act. Our comments are provided in accordance with the EPA-specific extension to the deadline date from June 15, 2005 to July 1, 2005 granted by Mary Beth Hennessy, Inyo National Forest Wilderness Planner (telephone conversation between Laura Fujii and Mary Beth Hennessy, May 26, 2005).

EPA commends the Forest Service effort to balance the multiple uses of the popular Ansel Adams and John Muir Wildernesses. Of note is the use of both internal and external controls that will enable more effective management of temporal and spacial use of the wilderness areas by commercial pack stock. EPA supports management actions that will address degraded meadows, campsites, stock holding areas, and trail conditions that contribute to water quality and ecosystem impairment. Based on our review, the internal controls specified in Alternative 2 allow for more precise resource management.

Based on our review and the above concerns, we have rated the DEIS as Environmental Concerns - Insufficient Information (EC-2). Please see the enclosed Detailed Comments for a description of these concerns and our recommendations. A *Summary of EPA Rating Definitions* is enclosed.

The description of the affected environment clearly states that many areas contain meadows, streams, and trails with degraded conditions and hydrological functions which may adversely affect water quality and sensitive critical areas. Although the action alternatives include elements to protect critical areas and reduce adverse impacts, the alternatives do not significantly improve the degraded conditions of these areas. We recognize the contribution of

historic high-levels of grazing, mining, and other wilderness uses to current environmental degradation. However, EPA remains concerned with the minimal water quality and ecological improvements provided by the proposed action alternatives.

EPA recommends additional management actions be integrated into the preferred alternative to ensure full compliance with water quality standards and more rapid restoration of degraded meadows, streams, and trails. We urge the Forest Service to consider stock night quotas that are aligned with meadow hydrological conditions, closure of meadows with stream segments assessed as functional at-risk with a downward trend, and exclusion of stock from standing water and saturated areas occupied by the Yosemite toad during the breeding and rearing season.

A detailed description and commitment to monitoring measures and enforcement is not provided in the DEIS. The lack of this information is of significant concern. Projected improvements to degraded resources is based upon compliance with new, more stringent use standards. We understand that more detailed enforcement and monitoring measures and commitments may be provided in subsequent NEPA analyses for individual Pack Stock Special Use Permits (p. I-2 and telephone conversation with Mary Beth Hennessy, June 23, 2005). If this is the case, we recommend the Forest Service describe the general framework for enforcement and monitoring in the Final Environmental Impact Statement (FEIS) for the Use Authorization action and commit to NEPA analyses for the individual Pack Stock Special Use Permits. These individual Special Use Permit NEPA analyses should include a detailed description and evaluation of monitoring and enforcement measures that will be applied to each permit.

We appreciate the opportunity to review this DEIS. When the FEIS is released for public review, please send two copies to the address above (mailcode: CED-2). If you have questions, please contact me or Laura Fujii, the lead reviewer for this project. Laura can be reached at 415-972-3852 or fujii.laura@epa.gov

Sincerely,
/s/

Nova Blazej, Acting Manager
Environmental Review Office
Communities and Ecosystems Division

Enclosures:
Summary of EPA Rating Definitions
EPA's Detailed Comments

cc:
Doug Feay, Lahontan Region, RWQCB
Jacob Martin, US Fish and Wildlife Service, Sacramento